

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

UNITED STATES OF AMERICA

*

v.

*

Criminal No.: GLR 21-444

MICHAEL MCDONALD

*

Defendant

*

* * * * *

MOTION TO SUPPRESS TANGIBLE EVIDENCE

The Defendant, Michael McDonald, by and through counsel, Julie M. Reamy, hereby moves this Honorable Court, pursuant to Rule 12 (b)(3) of the Federal Rules of Criminal Procedure, to suppress any evidence seized in violation of the Fourth Amendment to the United States Constitution and as grounds states the following:

1. The Defendant is charged by way of Indictment with one count of three counts of tax evasion in violation of 26 U.S.C. § 7201, and four counts of Failure to File a Tax Return in violation of 26 U.S.C. § 7203.

2. On or about October 7, 2020, and November 23, 2020, law enforcement officers searched Mr. McDonald's person, vehicles, and residence and recovered items that the Government intends to use as evidence in the prosecution against the Defendant in this case.

3. The Defendant contends that he was subjected to an unlawful search as the warrants authorizing the searches lacked sufficient probable cause in violation of his rights under the Fourth Amendment to the United States Constitution and the fruits of that illegal search and seizure must be suppressed.

WHEREFORE, the Defendant requests that this Court grant an Order of Suppression on the grounds alleged herein and any other ground that may become apparent upon a hearing on the motion.

Respectfully submitted,

_____/S/_____
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REQUEST FOR A HEARING

The Defendant requests a hearing on this Motion pursuant to Local Rule 105-6 of the United States District Court for the District of Maryland.

_____/S/_____
Julie M. Reamy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of March 2022, a copy of the foregoing *Motion to Suppress Tangible Evidence* was filed electronically in the United States District Court for the District of Maryland, was served electronically through the Clerk of the United States District Court using CM/ECF, upon Assistant United States Attorney, Kathleen Gavin.

_____/s/_____
Julie M. Reamy